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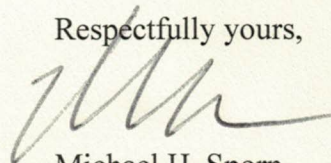
Hon. Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Glenn Thomas  
Ind. No. 12 Cr 626 (ER)

Dear Judge Ramos:

This letter is respectfully submitted to request that the sentencing proceeding currently scheduled for February 25, 2016 be adjourned to a date in early April that may be convenient to the Court. The reason for this request is that, as your Honor is aware, co-counsel has identified an issue under *Johnson v. United States*, 135 S.Ct. 2551 (2015) that potentially could have significant ramifications in our case. The defense would like an opportunity to analyze this issue and raise any appropriate legal arguments before sentencing. The government consents. Thank you for your consideration of this matter.

Respectfully yours,



Michael H. Sporn

MHS/ss

Cc: Kan Nawaday, Esq.  
George Goltzer, Esq.  
Megan Bennett, Esq.